

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	CASE NO. 1:12CR177
	:	
Plaintiff,	:	
	:	JUDGE DONALD C. NUGENT
vs.	:	
	:	<u>PROPOSED VOIR DIRE QUESTIONS</u>
JEFFREY REICHERT,	:	
	:	
Defendant.	:	
	:	

Now comes Defendant, Jeffrey Reichert, by and through counsel, and submits the enclosed voir dire questions for the upcoming trial. The government has submitted proposed voir dire questions already. Mr. Reichert has no objections to the government's proposed voir dire questions, but submits these questions as a supplement for voir dire examination to the panel.

Respectfully submitted,

/s/Darin Thompson

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PROPOSED SUPPLEMENTAL VOIR DIRE QUESTIONS

Questions to Supplemental Section C.

1. Mr. Reichert in this case has been accused of selling or trafficking video game consoles that had been fitted with chips that allowed these video game consoles to circumvent copyright protections. In this case, Mr. Reichert's defense is that he did not know this action was illegal. Mr. Reichert was aware, however, that the video game consoles he sold could be used to play video games that had been copied without the permission of the copyright holder. In essence, his actions allowed others to infringe copyrights. While Mr. Reichert is not on trial for what others did and is not accountable for their actions, do these consequences of Mr. Reichert's actions impact your ability to fairly weigh the evidence against him?

2. Ignorance of the law is not normally a defense to a federal criminal charge. In this case however, the law states that Mr. Reichert is not guilty of this offense if he was unaware that his conduct violated the law. The Judge will instruct you that if the government can not prove beyond a reasonable doubt that Mr. Reichert knew that his conduct was illegal, you must return a verdict of not guilty. Does anyone have a problem following this instruction? Put another way, does anyone feel that ignorance of the law should never be a defense?

Respectfully submitted,

/s/Darin Thompson

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CERTIFICATE OF SERVICE

I hereby certify that on January 11, 2013, a copy of the foregoing Proposed Voir Dire Questions was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/s/Darin Thompson

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